

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: ARC AIRBAGS INFLATORS
PRODUCTS LIABILITY LITIGATION

ALL CASES

Case No.: 1:22-md-03051-ELR

MDL No. 3051

Judge Eleanor L. Ross

**UNOPPOSED MOTION FOR
EXTENSION OF BRIEFING
DEADLINES WITH RESPECT
TO PLAINTIFFS' MOTION
FOR JURISDICTIONAL
DISCOVERY AS TO
DEFENDANT
VOLKSWAGEN
AKTIENGESELLSCHAFT**

Pursuant to Federal Rule of Civil Procedure 6(b), Specially Appearing Defendant Volkswagen Aktiengesellschaft ("VW Germany") respectfully requests that the Court (1) grant VW Germany a 14-day extension, through and including May 2, 2025, within which to file their Response to Plaintiffs' Motion for Jurisdictional Discovery as to VW Germany (the "Jurisdictional Discovery Motion"); and (2) grant Plaintiffs a 7-day extension, through and including May 23, 2025, within which to file their reply in further support of their Jurisdictional Discovery Motion as to VW Germany.

In support thereof, Specially Appearing VW Germany states as follows:

1. On February 28, 2025, specially appearing defendant VW Germany moved to dismiss Plaintiffs' Consolidated Corrected Class Action Complaint (the "VW Germany Motion to Dismiss"). Dkt. 319.

2. Pursuant to the Parties' agreement, and as approved by this Court, Plaintiffs filed their opposition to the VW Germany Motion to Dismiss on April 4, 2025. Dkt. 327; *see* Dkt. 304 (order granting VW Germany's unopposed motion for an extension of time).

3. On April 4, 2025, Plaintiffs also filed their Jurisdictional Discovery Motion as to VW Germany. Dkt. 328.

4. VW Germany's reply in further support of its Motion to Dismiss is due on May 2, 2025. Dkt. 304.

5. Pursuant to Local Rule 7.1(B), VW Germany's Opposition to the Jurisdictional Discovery Motion would be due on April 18, 2025.

6. Pursuant to Local Rule 7.1(C), Plaintiffs' Reply in further support of the Jurisdictional Discovery Motion would be due on May 2, 2025.

7. The Parties agree that the VW Germany Motion to Dismiss and the Jurisdictional Discovery Motion raise overlapping issues with respect to VW Germany's motion to dismiss for lack of personal jurisdiction. Accordingly, the Parties agree it would be most efficient for VW Germany to file its Reply in further

support of its Motion to Dismiss at the same time that it files its Response to the Jurisdictional Discovery Motion.

8. Thus, VW Germany requests that it be permitted to file its Response to Plaintiffs' Jurisdictional Discovery Motion on **May 2, 2025**. This is the same day that VW Germany's Reply in further support of its Motion to Dismiss is due, and it represents only a 14-day extension of time for VW Germany's Response to the Jurisdictional Discovery Motion.

9. Because this extension would provide VW Germany extra time to respond to Plaintiffs' Jurisdictional Discovery Motion, the Parties agree that Plaintiffs should also receive extra time for their Reply.

10. Accordingly, Plaintiffs request that they be permitted to file their Reply in further support of their Jurisdictional Discovery Motion on **May 23, 2025**. This date represents only a 7-day extension of time from what Local Rule 7.1(C) would otherwise prescribe for Plaintiffs' Reply, based on a Response date of May 2, 2025 (*see supra* ¶ 8).

11. The Court has granted similar extensions with respect to motions for jurisdictional discovery as to the other non-U.S. defendants. Dkt. 296 (ZF Friedrichshafen AG), 314 (Porsche AG and BMW AG), 324 (Audi AG).

Therefore, for good cause shown, Specially Appearing Defendant VW Germany respectfully requests that the Court (1) extend VW Germany's deadline to

respond to Plaintiffs' Jurisdictional Discovery Motion until May 2, 2025; and (2) extend Plaintiffs' deadline to file a reply in support of their Jurisdictional Discovery Motion until May 23, 2025. A proposed order granting this relief is attached.

Dated: April 11, 2025

Respectfully submitted,

/s/ Michael B. Shortnacy

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CERTIFICATION

Pursuant to Civil Local Rule 7.1, the undersigned counsel certifies that this brief has been prepared with one of the font and point selections approved by the Court in Civil Local Rule 5.1.

/s/ Michael B. Shortnacy
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